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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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MERRILL LYNCH BUSINESS FINANCIAL  
SERVICES, INC.

Plaintiff,

- vs -

ARTHUR KUPPERMAN, E. ROSS BROWNE,  
PAULETTE KRELMAN and PGB  
INTERNATIONAL, LLC, and JPMORGAN CHASE:  
BANK, NATIONAL ASSOCIATION,

Defendants.

CIVIL ACTION

Civil Action No. 06-4802 (DMC)

**JOINDER OF EMPRESAS LOURDES S.A. IN OPPOSITION TO DEFENDANT  
PAULETTE KRELMAN'S MOTION TO CLARIFY EX PARTE TEMPORARY  
RESTRAINTS AND REMOVE CERTAIN WRITS OF ATTACHMENT**

Empresas Lourdes, S.A., which appeared in this action by ay of its Notice of Appearance dated October 19, 2006, by its attorneys Gleason & Koatz, LLP, hereby joins in the opposition to Defendant Paulette Krelman's Motion to Clarify Ex Parte Temporary Restraints and Remove Certain Writs of Attachment (the "Motion") filed by Merrill Lynch Business Financial Services Inc. ("Merrill Lynch") and respectfully requests that the Motion be denied in its entirety for all the reasons set forth by Merrill Lynch.

GLEASON & KOATZ, LLP  
*Attorneys for Empresas Lourdes, S.A.*

By: /s/ John P. Gleason.  
John P. Gleason (JG2848)

Dated: November 1, 2006